UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

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§ § 2018 APR -4 AMII: 09

UNITED STATES OF AMERICA,

Plaintiff

CRIMINAL NO.:

WESTERN DISTRICT OF TEXAS

V.

CRIMINAL NO.:

SATS CRO2110 [Count 1 Cyberstalking, 18 U.S.C. §

2261A(2); Count 2 Interstate Communication of Threat, 18 U.S.C. § 875(c)]

JUSTIN AYOUB,

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Defendant

THE GRAND JURY CHARGES:

COUNT ONE

[Cyberstalking - 18 U.S.C. § 2261A(2)]

Beginning on or about March 8, 2018, and continuing through on or about March 14, 2018, in the Western District of Texas, and elsewhere, the Defendant,

JUSTIN AYOUB,

with the intent to harass, intimidate and place under surveillance with intent to harass and intimidate another person, namely A.A., used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to A.A., all in violation of Title 18, United States Code, Section 2261A(2).

COUNT TWO

[Interstate Communication of Threat – 18 U.S.C. § 875(c)]

On or about March 8, 2018, in the Western District of Texas, and elsewhere, the Defendant,

JUSTIN AYOUB,

did knowingly and willfully transmit in interstate commerce a communication to A.A., namely, a cellular telephone voice message to A.A., containing a threat to kill A.A. and B.F, in violation of Title 18, United States Code, Section 875(c).

A TRUE BILL.

GRAND JURY FOREPERSON

JOHN F. BASH United States Attorney

BETTINA J. RICHARDSON

Assistant United States Attorney